



HON. SYLVIA O. HINDS-RADIX  
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**THE CITY OF NEW YORK  
LAW DEPARTMENT**

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Application GRANTED. July 22, 2022

**Via ECF**

SO ORDERED.

Date: July 25, 2022

Hon. P. Kevin Castel  
United States District Court  
for the Southern District of New York  
500 Pearl Street  
New York, NY 10007-1312

  
P. Kevin Castel  
United States District Judge

Re: *Miller et al. v. City of New York et al.*, 21 Civ. 2616 (PKC)

Your Honor:

I am a Senior Counsel in the Office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York (the "City"), counsel for defendants in this matter.

I write to respectfully, request, with the consent of plaintiff's counsel, a two week extension of time, from July 25, 2022 to August 8, 2022, for the parties to submit their proposal for electronic discovery pursuant to the Court's Order of June 28, 2022 (ECF No. 59). The parties have conferred in accordance with the Court's order, conducted depositions regarding the location and nature of relevant documents, and continue to work cooperatively and in good faith to formulate search terms and a list of custodians. An additional two weeks is required to complete that process, in part because the City's counsel will be out of the office from July 26 through July 29, for the purposes of family medical leave.

Accordingly, defendants respectfully request that the Court allow the parties until August 8, 2022, to submit their proposal for ediscovery according to the requirements of the June 28, 2022 Order.

We thank the Court for its consideration of this matter.

Sincerely,

*Alan H. Scheiner /s/*

Alan H. Scheiner

Senior Counsel

Special Federal Litigation Division

cc (via ECF): All counsel